

**Overview:**  
**Key Facts**

- \* To date, BellSouth has signed over **200 interconnection agreements** with local competitors in our markets. This is far and away the highest number of agreements signed by any other regional Bell company.
- \* In July of this year, BellSouth created the Network and Carrier Services organization dedicated to providing network services to both BellSouth's own marketing units, and to the CLEC customers in BellSouth's region. This unit is composed of almost **30,000 employees** each focused on meeting the needs of all BellSouth customers, both traditional and new competitors.
- \* By year-end, BellSouth will have committed almost **\$500 million** for assuring our systems and processes are designed to allow competitors access to our local phone service markets. Employee resources dedicated to CLEC customers will total over 700.
- \* The Local Carrier Service Center (LCSC) was established to serve distinct CLEC customer groups. The LCSC provides **24 hour, 7 day-a-week access** for CLEC customers for service delivered on par to that provided to our traditional residential and business customers.
- \* BellSouth provides **Account Teams** to every CLEC customer. These teams are supported by experts on technical matters including provisioning, maintenance, network quality, interconnection, and resale and unbundled network element services.
- \* To date, there are over **300 CLECs** certified to provide service in the BellSouth region. The LCSC is currently providing service to almost 70 of these customers across our region.
- \* The LCSC and associated operational support systems have processed orders for over **100,000 resale lines and unbundled loops** from our CLEC customers.

**(more)**

## **Key Facts (con't)**

- \* BellSouth systems have a capacity to process **10,000** orders a day from competitors using our electronic interfaces.
- \* For competitors who aren't currently using our interfaces, representatives in our Local Carrier Service Center are processing **1,180** service orders per day with a proven capacity of **2,400** orders per day.
- \* BellSouth currently offers automatic/electronic ordering for 30 simple resale products and 4 unbundled network element (UNEs) through these systems. We also offer 20 other complex resale and UNEs services for competitors. The products offered to our competitors generate **over 90%** of BellSouth's total retail consumer and small business revenue, and **over 80%** of BellSouth's large business revenues.
- \* BellSouth has trained over **300** representatives from various CLECs in order to make sure they can use our systems to process orders for their own customers.
- \* BellSouth has established **not one but two electronic interface options** for use by competitors for ordering functions.
- \* BellSouth developed the Electronic Data Interchange (EDI) interface in accordance with **national standards** and it provides CLEC customers with the ability to electronically enter customer service orders to BellSouth for provisioning through to the network. EDI supports all order types in the Ordering and Billing Forum national standard.
- \* BellSouth has also developed the **LENS (Local Exchange Navigation System)** for use by competitors. This interface provides access to BellSouth systems for securing and confirming pre-ordering information (such as telephone numbers, addresses, feature availability, customer service records, and due dates), and for executing real-time ordering functions for CLEC customers.

**(more)**

## **Key Facts (con't)**

- \* For maintenance and repair functions, BellSouth has made the **Trouble Analysis Facilitation Interface (TAFI)** available for use by competitors. This is the same system the BellSouth uses to identify, analyze, and perform maintenance and repair activity for its own customers.
- \* BellSouth is also developing **specialized** electronic interfaces to meet the individual needs of local competitors. An example is the development of a system called EC Lite for AT&T due for delivery in December of this year. The company is also developing a special maintenance and repair system for both AT&T and MCI.
- \* BellSouth's performance in connecting competitors to our network is equal to or better than the level of service provided to our own residential and business customers. BellSouth has met the CLEC committed due dates for installing service at a rate of over **98%** for CLEC residence orders, and over **99%** for business customers.
- \* The Louisiana and South Carolina Public Service Commissions have **ruled** that BellSouth meets the 14-point checklist defined in the Telecommunications Act. These orders have found that BellSouth has the appropriate systems in place to accommodate local competitors in our markets.

## **Overview:**

### **BellSouth's Local Carrier Service Center**

In order to provide BellSouth's CLEC customers with the highest quality service possible, the company established a dedicated ordering and service center for operational CLECs. The Local Carrier Service Center (LCSC) serves distinct CLEC customer groups out of locations in **Atlanta and Birmingham.**

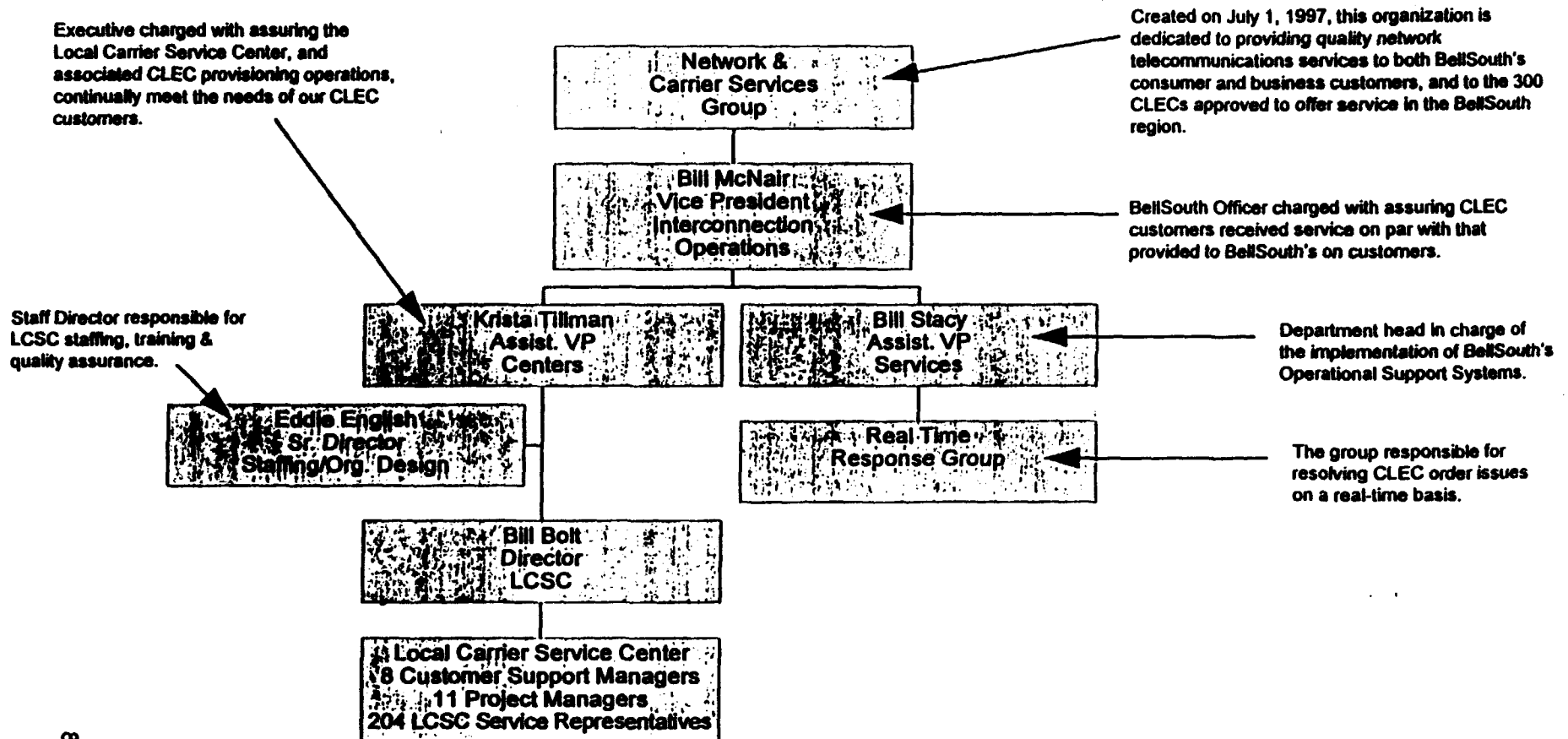
- \* By year end, total BellSouth employee resources dedicated to CLEC customers will equal over **700**. There are currently over 200 employees in the LCSC and UNEC split between the following functions:

- Servicing and provisioning CLEC resale orders.
- Provisioning CLEC unbundled network element orders.
- A dedicated CLEC start-up team.

**Operations are linked by OSSs for order provisioning.**

- \* In order to assure outstanding quality control, the LCSC has developed **stringent** hiring standards for service representatives. The process includes an evaluation, testing and training program for each new LCSC employee.
- \* The LCSC provides **24 hour, 7 day-a-week access** for CLEC customers for service delivered on par to that provided to our traditional residential and business customers. We have a proven capacity to process 2,400 CLEC orders per day submitted to this center.
- \* BellSouth has trained over **300** representatives from various CLECs in order to make sure they can use our systems to process orders for their own customers.
- \* To date, there are over **300 CLECs** certified to provide service in the BellSouth region. The LCSC is currently providing service to almost **70** of these customers across our region.
- \* The LCSC and associated operational support systems have processed orders for over **100,000 resale lines and unbundled loops** from our CLEC customers.

# BellSouth's Organizational Design for Serving CLECs



**Overview:**  
**BellSouth's Operational Support Systems**

- \* In accordance with the requirements of the Telecommunications Act of 1996, BellSouth has established electronic interfaces, and ordering and maintenance operational support systems for use by CLEC customers in the BellSouth region.
- \* BellSouth currently offers electronic ordering for 30 simple resale products and 4 unbundled network element (UNEs) through these systems. We also offer 20 other complex resale and UNEs services for competitors. The products offered to our competitors generate over 90% of BellSouth's total retail consumer and small business revenue, and over 80% of BellSouth's large business revenues.
- \* In order to facilitate CLEC ordering functions, BellSouth has established **two electronic interface options** for use by competitors. The first is the EDI (Electronic Data Interchange) system interface. This interface was developed in accordance with **national standards** and provides CLEC customers with the ability to electronically enter customer service orders to BellSouth for provisioning through to the network.
- \* BellSouth has also developed the **LENS (Local Exchange Navigation System)** for use by competitors. This interface provides access to BellSouth systems for securing and confirming pre-ordering information (such as telephone numbers, addresses, feature availability, customer service records, and due dates), and for executing real-time ordering functions for CLEC customers.
- \* For maintenance and repair functions, BellSouth has made the **Trouble Analysis Facilitation Interface (TAFI)** available for use by competitors. This is the same system the BellSouth uses to identify, analyze, and perform maintenance and repair activity for its own customers.
- \* BellSouth is also developing **specialized** electronic interfaces to meet the individual needs of local competitors. An example is the development of a system called EC Lite for AT&T due for delivery in December of this year. The company is also developing a special maintenance and repair system for both AT&T and MCI.

## **List of Products and Services Available for CLECs**

### **30 Simple Resale Products**

- |                            |                                    |
|----------------------------|------------------------------------|
| * Flat Rate Residence      | * Call Return                      |
| * Flat Rate Business       | * Repeat Dialing                   |
| * Measured Rate Residence  | * Preferred Call Forwarding        |
| * Measured Rate Business   | * Caller ID                        |
| * Touchtone                | * Enhanced Caller ID               |
| * Speed Calling            | * MemoryCall                       |
| * Three Way Calling        | * MemoryCall Answering Service     |
| * Call Waiting             | * Optional Calling Plan            |
| * Call Waiting Deluxe      | * Area Plus                        |
| * Call Forwarding Variable | * Integrated Pkg - Area Plus, Area |
| * Remote Call Forwarding   | Plus w/Complete Choice &           |
| * Remote Access to CF      | Complete Choice                    |
| * RingMaster               | * Georgia Community Calling        |
| * Call Tracing             | * Independent Payphone Provider    |
| * Call Block               | * Message Telephone Service        |
| * Call Selector            | * Visual Director                  |

### **20 Complex Resale Products #**

- |                        |                            |
|------------------------|----------------------------|
| * Accupulse            | * Megalink Channel Service |
| * Basic Rate ISDN &    | * Megalink Plus            |
| Primary Rate ISDN      | * Multiserv/MultiServ Plus |
| * Centrex/ESSX         | * Msg/Meas Rate PBX        |
| * DID                  | Trunks                     |
| * E991/SALI            | * Native Mode LAN          |
| * Flat Rate PBX Trunks | Interconnection (NMLI)     |
| * FlexServ             | * Off Premise Extension    |
| * Frame Relay & CDS    | (OPX)                      |
| * Lightgate            | * SmartPath DS-1           |
| * MegaLink             | * SmartRing                |
|                        | * Synchronet               |

# These products are ordered and provisioned manually in the same process used for BellSouth's retail customers.

**Overview:**  
**BellSouth's CLEC Customer Care Initiatives**

- \* Earlier this year, BellSouth embarked on a **company-wide internal communications effort** designed to reinforce with every BellSouth employee that providing service to CLEC customers is a critical part of BellSouth's operational focus. As a part of the continued implementation of this initiative, all customer contact employees have received individual training on the importance of treating competitors fairly.
- \* BellSouth has created a **start-up team** working out of the Local Carrier Service Center that is dedicated to providing on-site support to new CLECs to help them get up and running.
- \* Since early this spring, BellSouth has conducted **specialized training** for its CLEC customers to familiarize them with the processes and systems that BellSouth has implemented for their use. To date, over 300 CLEC representatives have been trained. Pre-scheduled training sessions now occur once a month, but specialized training is available as requested.
- \* BellSouth has established a **real-time operations and problem resolution center** designed to provide continuous support in resolving service issues on CLEC orders. This center investigates service problems associated with CLEC orders, and once a resolution is determined, institutionalizes the remedy to assure repeat problems are minimized.
- \* BellSouth has developed the **"Resale Ordering Guide"** and the **"Local Carrier and Facility Based Ordering Guide,"** and the **"Local Exchange Ordering Implementation Guide"** for use by CLEC customers. These guides provide information on doing business with BellSouth from a CLEC perspective and have been distributed to the over 300 CLECs now certified to do business in our region.

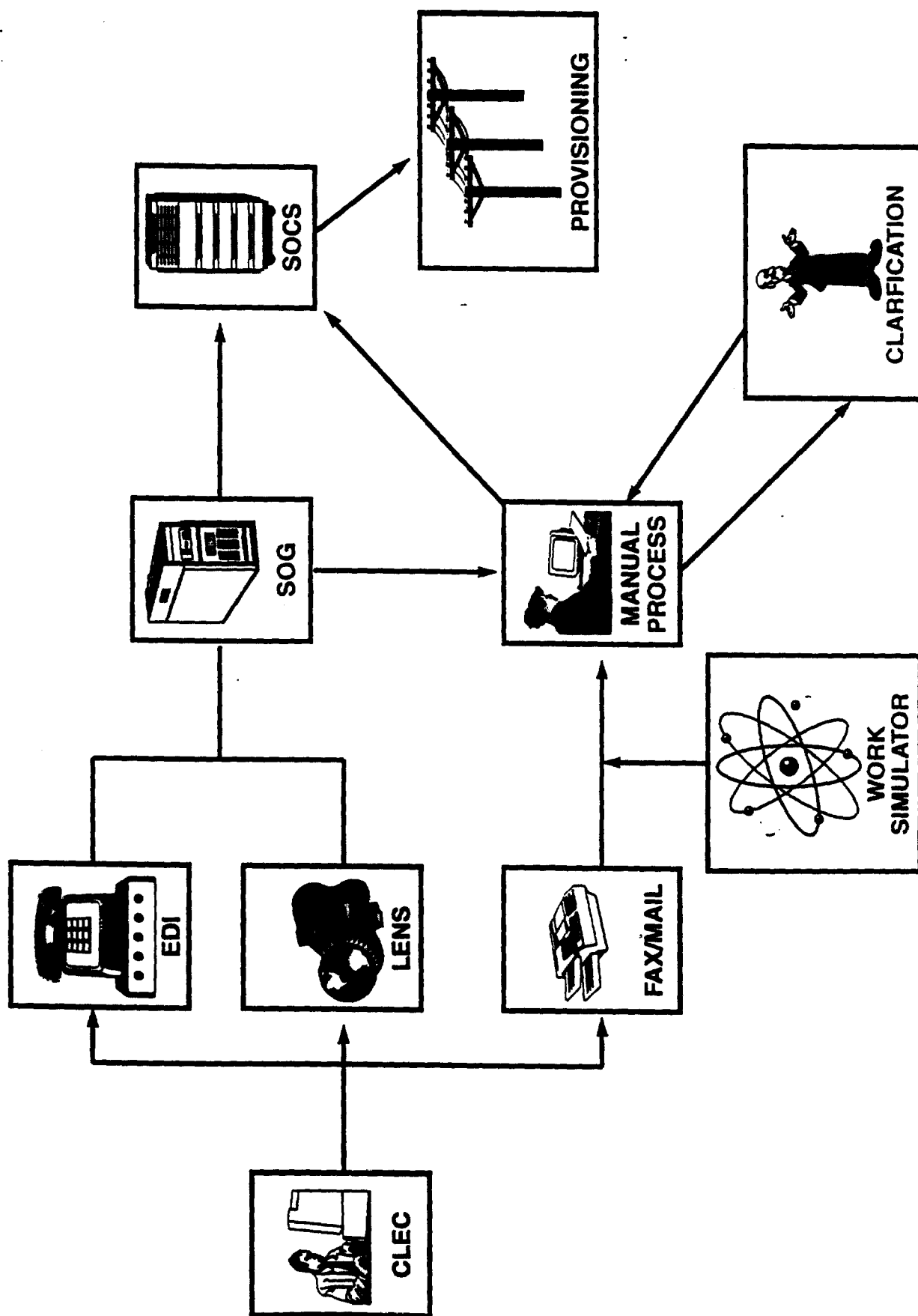
**Overview:**  
**Initiatives To Maintain Service Quality**

- \* To date, BellSouth has made over 50 resale products, and a variety of unbundled network elements (UNEs), available for competitors to order. While the majority of these orders will flow through the systems automatically, plans call for **UNE flow-through** on a limited basis by December of this year.
- \* BellSouth is constantly **enhancing** the electronic interface capabilities offered through the LENS and EDI interfaces based on CLEC feedback and internal upgrade programs.
- \* BellSouth is also developing **specialized** electronic interfaces to meet the individual needs of local competitors. An example is the development of a system called EC Lite for AT&T due for delivery in December of this year. The company is also developing a special maintenance and repair system for both AT&T and MCI.
- \* In order to provide continuous on the job training, the Local Carrier Service Center has implemented a **"Work Simulator"** for service representative use. This order generator randomly drops sample orders to service rep locations for them to process on an ongoing basis. This system will lead to improvements in both quality and productivity by the LCSC.

***Exhibit:***  
**BellSouth CLEC Ordering Process**

- CLECs can place orders with BellSouth for their own customers through a variety of electronic or manual interfaces.
- The first is that they can initiate an order through the company's EDI interface. This is the OSS interface developed in accordance with national standards and provides CLECs with the ability to electronically enter customer orders to BellSouth.
- The second access point could be through an internet arrangement using LENS (Local Exchange Navigation System). This interface provides the CLECs access to BellSouth systems for securing and confirming pre-ordering information (such as telephone numbers, addresses, billing name, etc.), and for entering service requests.
- CLECs can also send orders by either FAX or through the mail direct to the Local Carrier Service Center for processing by BellSouth representatives.
- Once electronic orders are received, the Service Order Generator checks for errors and, if none are found, passes a service order to the Service Order Control System for provisioning and completion.
- Orders that contain errors are removed from the systems for clarification, are corrected, and then forwarded for provisioning.
- Orders received by the LCSC by either FAX or mail, are input into BellSouth's Service Order Control Systems for provisioning and completion.

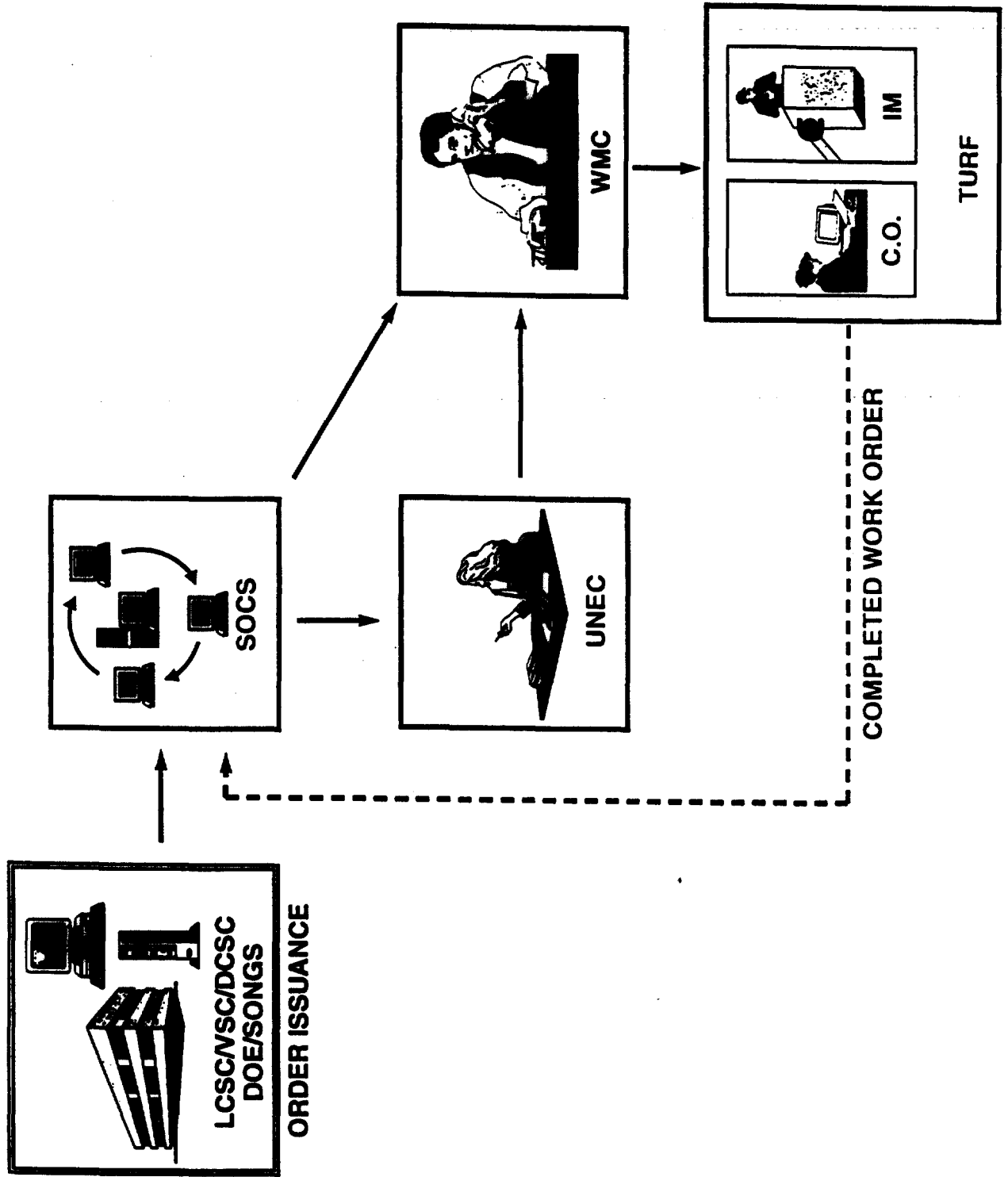
# ORDERING



***Exhibit:***  
**BellSouth CLEC Provisioning Process**

- All orders, regardless of the company originating them, i.e. a CLEC or a BellSouth retail unit, are provisioned through the network in the same manner.
- SOC distributes the service orders to all BellSouth internal OSSs and work groups involved in the provisioning process.
- The Work Management Center (WMC) manages the dispatch of field technicians.
- The Unbundled Network Element Center (UNEC) coordinates the unique activities required to provision UNEs.

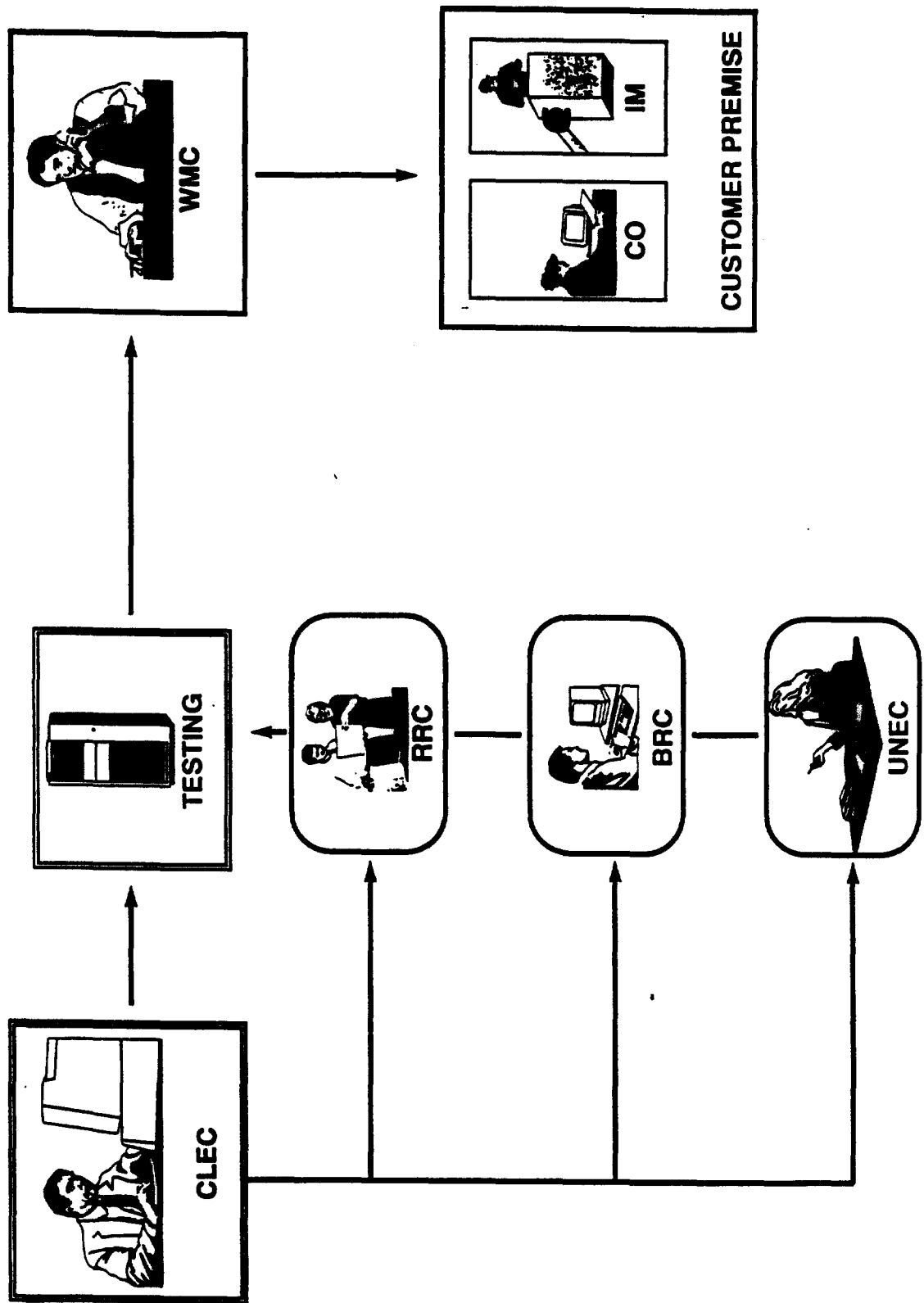
# PROVISIONING



***Exhibit:***  
**BellSouth CLEC Maintenance Process**

- The Trouble Analysis Facilitation Interface (TAFI) is available for use by CLECs to report troubles and perform maintenance functions on their customer lines.
- This system is also used by BellSouth for maintaining and repairing lines for its own customers.
- CLECs can access their customer records online, perform analysis and trouble testing, and initiate a repair visit as needed.
- The CLEC can also report troubles by telephone to the Residence Repair Center (RRC), Business Repair Center (BRC), or the UNEC.
- The WMC manages the dispatch of field technicians as required.

# MAINTENANCE



## **Questions & Answers**

### **Q1) What are electronic interfaces and operational support systems?**

**A1) Operational support systems are the systems used by both BellSouth and our competitors to support various operations such as ordering and maintenance. Specifically, there are three electronic interfaces competitors can access:**

**TAFI (Trouble Analysis Facilitation Interface) is a man-to-machine system CLECs can use for reporting troubles on regular phone lines. This system is the same used by BellSouth's retail customers.**

**LENS (Local Exchange Navigation System) is a real-time, interactive, WEB-based, man-to-machine interface CLECs can use for order/pre-order functions.**

**EDI (Electronic Data Interchange) is a machine-to-machine interface for batch ordering. Information is exchanged in a fixed record format according to industry standard protocols.**

**BellSouth treats all orders and maintenance systems the same, and provides customers the same response time whether the CLEC generates the order, BellSouth generates the order for the CLEC or BellSouth generates the order for a BellSouth end-user customer.**

### **Q2) How can a CLEC access these systems?**

**A2) CLECs can access these various operational support systems by connecting to BOSIP, the BellSouth Open Systems Interconnect Protocol. BOSIP is an intranet within BellSouth that connects all of our ordering, maintenance, billing and other systems together.**

**CLECs have two options from which to choose to connect to BOSIP, and their BellSouth account team can help them determine the best solution for their business.**

**The first option is a LAN (Local Area Network) to LAN connection from the CLEC's location to the nearest BellSouth connection. The second option is to dial into the system (through a local number in Atlanta).**

### **Q3) Are these ordering and trouble reporting systems comparable to the internal systems used by BellSouth to service its customers?**

**A3) Yes. The operational support systems developed for CLECs provides access in substantially the same time and manner as BellSouth's own internal systems (TAFI and RNS). All orders and reports, whether generated through the CLEC**

systems or our own systems, are routed to the same back end systems for processing.

Furthermore, these systems meet all requirements of the Telecommunications Act for local competition. In fact, in some cases we exceeded the standards.

Additionally, the Louisiana and South Carolina commissions found that BellSouth's systems – which serve all nine states in the region – met all requirements of the Telecom Law.

**Q4) Why can't a CLEC just connect to the same systems your employees use?**

**A4)** BellSouth's OSS system architecture is based on proprietary systems developed for our use – at our expense – and we are not required by federal or state law to make them available to our competitors for security reasons.

What we are required to do is to allow our competitors to connect to our network through systems that provide access in substantially the same time and manner as BellSouth's own internal systems. Ultimately, all orders – whether generated by the CLEC or by BellSouth – flow to the same back end and support systems.

**Q5) Does a CLEC have to use the operational support systems, or can it just call BellSouth? What other options are available?**

**A5)** Due to the complexity of service orders, competitors may not call in their request; BellSouth must have written documentation of all orders. In addition to using EDI and LENS, CLECs can place orders manually by faxing their request, as many do today. For maintenance and repair, however, the CLEC may call a BellSouth center to report their customer's trouble.

**Q6) Doesn't this add an extra step in the ordering process for your competitors?**

**A6)** No. If the CLEC places an order through EDI or LENS, their representatives input the information into the ordering system. If the CLEC faxes their request to BellSouth, one of BellSouth's service representatives must input the information into a similar ordering system.

**Q7) What complaints do your competitors have with your operational support systems?**

**A7)** There are differences between BellSouth and our competitors about the exact requirements of the law related to operational support systems. From our standpoint, BellSouth has met every requirements of the Telecommunications Act for local competition, and in some cases we exceeded those standards. Furthermore, the Louisiana and South Carolina commissions have ruled our operational support systems – which serve each of our nine states – met all requirements of the law.

**Q8) How many orders have you processed so far on these CLEC systems? How many per day? What is your total capacity?**

**A8) To date we've processed about 5,000 orders for CLECs using these operational support systems and we average between 150 and 300 orders per day. Our capacity is 2,000 orders per day through LENS and 8,000 orders per day through EDI. We are currently receiving orders from a variety of CLECs including large competitors such as AT&T and MCI, and smaller companies including Winstar Wireless and ACSI.**

**Q9) How many CLECs use these systems?**

**A9) Currently, 22 CLECs use LENS, one uses EDI and 9 use TAFI. Other CLECs are in various stages of evaluating their use of these systems.**

**Q10) Can you develop special systems for a particular CLEC at the CLEC's request?**

**A10) Yes. As a matter of fact, we are developing a special ordering system for AT&T at their request to meet their specifications. It will be available in December. The company is also developing a special maintenance and repair system for both AT&T and MCI.**

**Q11) Doesn't the recent order by the FCC denying Ameritech's long distance application for Michigan call for OSSs interface capabilities that you don't have?**

**A11) In our opinion, the FCC's order goes well beyond the requirement for OSS interfaces required by the law. We believe our systems met the requirements of the law and two state commissions have validated this. Further, our systems are operational and CLECs are using them to place orders for their customers.**

## **Glossary of Terms/Acronyms**

<b>CLEC</b>	Competitive Local Exchange Carrier. There are currently over 300 CLECs authorized to offer service in the BellSouth region.
<b>EDI</b>	Electronic Data Interchange. This is one of the ordering systems that BellSouth has developed for use by CLECs. This system meets the national standards for ordering interfaces.
<b>LCSC</b>	Local Carrier Service Center. This center, currently staffed with over 300 BellSouth professionals, provides 24 hour, 7 day-a-week service for the ordering and provisioning needs of our CLEC customers.
<b>LENS</b>	Local Exchange Navigation System. This gateway interface has been established for use by CLECs in obtaining pre-ordering information, and for executing orders electronically for their own customers.
<b>LNP</b>	Local Number Portability. The implementation of LNP allows customers to keep the same telephone number if they choose to have their service provided by a CLEC.
<b>OSS</b>	Operational Support Systems. BellSouth has developed OSSs that meet the requirements of the Telecommunications Act for providing CLECs with electronic access to our ordering and provisioning systems.
<b>TAFI</b>	Trouble Analysis Facilitation Interface. This system is used by both BellSouth and CLECs for maintenance and repair functions. This is the same system the BellSouth uses to identify, analyze, and perform maintenance and repair activity for its own customers.
<b>UNE</b>	Unbundled network elements. UNEs can be bought by CLECs and combined with their network capabilities to form whole services.

# ATTACHMENT 40

1 BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA  
2 COLUMBIA, SOUTH CAROLINA

3 HEARING #9633 JULY 8, 1997 9:00 AM.

4 DOCKET NO. 97-101-C: BELL SOUTH TELECOMMUNICATIONS, INC. - Entry into  
5 InterLATA Toll Market [Section 271].

6 HEARING BEFORE: Chairman Guy Butler, Presiding; Vice Chairman Philip T. Bradley;  
7 and Commissioners Rudolph Mitchell, Cecil A Bowers, Warren D. Arthur, IV, William "Bill"  
8 Saunders, and C. Dukes Scott.

9 STAFF: Gary E. Walsh, Deputy Executive Director; D. Wayne Burdett, Manager, and James  
10 M. McDaniel, William O. Richardson, and David S. Lacoste, Utilities Department; R. Glenn  
11 Rhyne, Manager, and James E. Spearman, Research Department; F. David Butler, Esq.,  
12 General Counsel; and MaryJane Cooper, Hearing Reporter.

13 BELL SOUTH COMPANIES: Harry M. Lightsey III, Esq., F. Austin, Esq., William Ellenburg,  
14 Esq., and Edward Rankin, Esq., representing BELL SOUTH TELECOMMUNICATIONS,  
15 INC.

16 Kevin A Hall, Esq., and Dwight F. Drake, Esq., representing  
17 BELL SOUTH LONG DISTANCE, INC.

18 INTERVENORS: William R. Atkinson, Esq., Darra W. Cothran, Esq., and Carolyn C.  
19 Matthews, Esq., representing SPRINT COMMUNICATIONS COMPANY, L.P.

20 John M.S. Hoefer, Esq., and Marsha A Ward, Esq., representing MCI  
21 TELECOMMUNICATIONS, INC.

22 Mitchell M. Willoughby, Esq., representing SOUTH CAROLINA  
23 CABLE TELEVISION ASSOCIATION.

24 Herbert Buhl, Esq., representing COMMUNICATION WORKERS OF  
25 AMERICA

26 Francis P. Mood, Esq., Kenneth P. McNeely, Esq., Michael Hopkins,  
27 Esq., and Steve A Matthews, Esq., representing AT&T COMMUNICATIONS OF THE  
28 SOUTHERN STATES, INC.

29 Elliott F. Elam, Jr., Esq., representing CONSUMER ADVOCATE FOR  
30 THE STATE OF SOUTH CAROLINA

31 Russell B. Shetterly, Jr., Esq., representing ACSI (American  
32 Communications Services, Inc.).

33 Frank R. Ellerbe III, Esq., representing SOUTH CAROLINA  
34 COMPETITIVE CARRIERS ASSOCIATION.

35 TRANSCRIPT OF TESTIMONY AND PROCEEDINGS  
36 VOLUME 7 OF 7

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1 CHAIRMAN BUTLER: MCI?

2 MS. WARD: Thank you, Mr. Chairman

3 CROSS-EXAMINATION BY MS. WARD:

4 Q Good morning. I'm Marsha Ward.

5 A Good morning.

6 Q Mr. Stacy, I would like to follow up on a question  
7 regarding TAFI and its ability to report troubles for  
8 unbundled network elements. And Mr. Atkinson asked you if it  
9 was like a fax, and you said that was not so; is that correct?

10 A That's correct.

11 Q What is it like? How does it work?

12 A TAFI is a computer system that uses the CLEC's discussion  
13 with the customer to analyze the trouble and to attempt to  
14 resolve the trouble while the CLEC is on line talking to the  
15 customer. It applies a series a of rules of artificial  
16 intelligence that BellSouth has developed over a number of  
17 years from its own customer to try to anticipate what -- when  
18 the customer describes the trouble, to try to anticipate what  
19 the trouble is and take corrective action if it's possible.  
20 In the case of telephone numbered services, a number of  
21 corrective actions -- for instance, if a customer is suppose to  
22 have call-forwarding service, and that call-forwarding service  
23 has been deleted through some error in BellSouth's computer  
24 systems, that omission can be corrected while the CLEC's  
25 service rep is on line using TAFI. So it is an interactive

1 system to both report and correct troubles.

2 Q Now, tell me how that application would work if there is a  
3 trouble with an unbundled loop?

4 A It does not apply to unbundled loops, and I did not  
5 respond to that question. He asked about unbundled ports.

6 Q All right. Well, tell me how it would respond to a  
7 trouble on an unbundled port?

8 A TAFI can not be used to report a trouble on an unbundled  
9 loop.

10 Q Listen to my question. You said Mr. Atkinson asked you  
11 about an unbundled port. Would you please tell me how TAFI  
12 would work if a trouble is reported on an unbundled port?

13 A I'm sorry. I misunderstood. I thought you said  
14 unbundled loop.

15 Q I said that first. You corrected me.

16 A Sorry.

17 Q I'll go with your example.

18 A On an unbundled port, an unbundled port looks no differently  
19 to the TAFI system than a telephone number which is not hooked  
20 up to a loop. It has all the characteristics of a central  
21 office telephone number. The trouble is reported, analyzed  
22 and managed the same way.

23 Q So it's totally electronic?

24 A It is totally electronic unless some manual work has to be  
25 done in the central office to resolve the problem, just as it

1 would for a BellSouth subscriber who had a problem with a  
2 piece of central office equipment.

3 Q So the information is entered into TAFI, and it's handled  
4 completely electronically as it relates to an unbundled port?

5 A Up until the point of physical work being required at the  
6 end of the trouble.

7 Q Is there any other unbundled network element that TAFI can  
8 be utilized totally electronically?

9 A Any of the unbundled elements that are associated with a  
10 telephone number, and there are several of those that have  
11 telephone numbers associated in combinations of elements. But  
12 the port is the most common.

13 Q Give me another example, then. Would a loop be associated  
14 with a number?

15 A Not unless they have been recombined, and then in this  
16 state's order, they look like a resold service and are treated  
17 as a resold service. In that case, it does. Normally, an  
18 unbundled loop is just a loop, and the CLEC has the chance to  
19 connect to that to their own switch or to take it and do  
20 anything with it that's legal within the bounds of the  
21 agreement.

22 Q So the port is actually the only unbundled network element  
23 that TAFI can be used for trouble reporting?

24 A The port and the variety of ports that are available --2R  
25 ports, PBX trunk ports that have numbers assigned to them, ISDN